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May 16, 2024

Via the CM/ECF System

Hon. Michael A. Hammer, U.S.M.J.
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *Grushack v. N.J. Dep't of Corrections, et al., No. 2:21-cv-623-EP-MAH*

Dear Judge Hammer:

As you know, I represent Defendants, the New Jersey Department of Health ("DOH"), Dr. Doreen Stanzione, Dr. Merrill Main, Shantay Adams, and former Commissioner of the DOH, Judith M. Persichilli (collectively, "DOH Defendants"), as well as the New Jersey Department of Human Services and its former Commissioner, Carole Johnson (collectively, "DHS Defendants"). Please accept this as the parties' joint letter regarding an agreed-upon proposed schedule for Defendants' summary judgment motions in response to Your Honor's text order (ECF No. 92) and the May 14, 2024 settlement conference:



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1. Summary judgment motions served on or before **Friday, July 26, 2024**;
2. Opposition papers served on or before **Friday, August 30, 2024**; and
3. Reply briefs served on or before **Monday, September 22, 2024**.

*All of the above will be filed at once by the parties on **Monday, September 22, 2024** in accord with the “Old Appendix N” procedure as per Your Honor’s instruction.*

If the above schedule meets with Your Honor’s approval, the corresponding return date would be **Monday, October 7, 2024**. I thank Your Honor for your time and attention to this matter.

Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: 

Michael R. Sarno
Deputy Attorney General

cc: Edward J. Hesketh, Esq./Hamill Patel, Esq.
Marvin L. Freeman, DAG

So Ordered:

/s/Michael A. Hammer
Michael A. Hammer, U.S.M.J.

DATED: 5/17/24